

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**BILL OF INFORMATION FOR MAIL FRAUD,  
IDENTITY THEFT AND WRONGFUL DISCLOSURE  
OF INDIVIDUALLY IDENTIFIABLE HEALTH INFORMATION**

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

v.

\*

SECTION:

SHERRIE BLAIR  
CLYDE WASHINGTON

\*

VIOLATION: 18 U.S.C. § 1341

18 U.S.C. § 1028(a)(7)

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42 U.S.C. § 1320d-6(a)(2)

18 U.S.C. § 2

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The United States Attorney charges:

**COUNT 1**  
***(Mail Fraud)***

**A. AT ALL TIMES MATERIAL HEREIN:**

1. Medical Center “A” is a non-profit hospital located in the city of New Orleans. The hospital offers primary care, pediatrics, heart and vascular, cancer, digestive, and multi transplant organ services.
2. Medical Center “A” is a covered entity under the Health Insurance Portability and Accountability Act (HIPAA).
3. HIPAA protects the individual identifiable health information collected from an individual by a health care provider.

4. Clyde Washington was employed by Medical Center “A” from in or near November 2008 until on or about June 3, 2009. In his capacity as a janitor, he stole printouts containing confidential patient information such as names, social security numbers, dates of birth, phone numbers, home addresses and other personal information that was intended to be shredded.
5. Defendant **SHERRIE BLAIR** was unemployed and resided in Avondale, Louisiana.
6. J.P. Morgan Chase & Co. is a holding company headquartered in New York, New York and provides services to customers and clients under the Chase and J.P. Morgan brands. Chase provides services such as online banking, ATM, credit cards, and retail checking to its customers.
7. J.P. Morgan Chase & Co. and the affiliated brands are insured by the Federal Deposit Insurance Corporation (FDIC).
8. Defendant **SHERRIE BLAIR** was a customer of Chase and previously opened a checking account ending in XXXX8004.
9. Wells Fargo & Co. is a diversified financial services company headquartered in San Francisco, California which provides banking, mortgage, investing, credit card, insurance, and consumer and commercial financial services.
10. Defendant **SHERRIE BLAIR** was a customer of Wells Fargo and previously opened a Wells Fargo bank account ending in XXXX8428.
11. United Cash Loans, Cashnetusa, Payday One, and Oneclickcash are all online, loan, and cash advance financial service companies that allow customers to quickly receive access to funds. In order to qualify, the customer is required to state that they are employed, earn approximately \$800 per month, own a bank account, are at least 18 years of age and are a United States citizen.

12. Home Depot, Best Buy, Kohl's, Zappos, and Dell are retail service companies that offer home improvement, electronics, and clothing products available for purchase online.

**B. THE SCHEME AND ARTIFICE TO DEFRAUD:**

Beginning at a time unknown but prior to on or about March 3, 2009, and continuing until on or about December 3, 2009, in the Eastern District of Louisiana and elsewhere, defendant **SHERRIE BLAIR** knowingly devised and intended to devise a scheme and artifice to defraud various financial and retail service companies, by opening fraudulent accounts, in the names of former Medical Center "A" patients, in order to obtain money and property.

It was further part of the scheme and artifice to defraud that on or about March 3, 2009, Clyde Washington, in his capacity as janitor, stole patient information sheets from Medical Center "A", in order to obtain information such as social security numbers, dates of birth, and addresses.

It was further part of the scheme and artifice to defraud that Clyde Washington then brought the patient information sheets to the residence of his girlfriend, **SHERRIE BLAIR**..

It was further part of the scheme and artifice to defraud that **SHERRIE BLAIR** then created accounts in the names of the Medical Center "A" patients contained on the information sheets.

It was further part of the scheme and artifice to defraud that on or about March 13, 2009, **SHERRIE BLAIR** used the internet to obtain a Best Buy credit card in the name of Medical Center "A" patient J.W.

It was further part of the scheme and artifice to defraud that on or about March 13, 2009, **SHERRIE BLAIR** used the internet to attempt to obtain credit cards from Kohl's, Target, American Eagle, Old Navy, and Citizen's Bank in the name of Medical Center "A" patient, J.W.

It was further part of the scheme and artifice to defraud that once **SHERRIE BLAIR** opened the accounts using the internet, she was then able to either order merchandise that would be shipped to her residence for her use, or for others, or use the accounts to generate funds that she would use to purchase items for her use, or for others.

It was further part of the scheme and artifice to defraud that on or about March 18, 2009, **SHERRIE BLAIR** used the Best Buy card she obtained in Medical Center "A" patient J.W.'s name to purchase DVD's, CD's, and other items.

It was further part of the scheme and artifice to defraud that on or about April 5, 2009, **SHERRIE BLAIR** used the internet to obtain a Kohl's credit card with a credit line of \$1200, in the name of Medical Center "A" patient, L.M.

It was further part of the scheme and artifice to defraud that on or about April 7, 2009, **SHERRIE BLAIR** used the internet to attempt to obtain a 14k gold diamond band ring worth \$800 from Kohl's, using the credit card obtained on April 5, 2009.

It was further part of the scheme and artifice to defraud that on or about April 7, 2009, **SHERRIE BLAIR** used the internet to obtain a \$300 Cashnetusa loan in the name of Medical Center "A" patient, D.H.

It was further part of the scheme and artifice to defraud that on or about April 8, 2009, **SHERRIE BLAIR** used the internet to transfer \$300 from the Cashnetusa loan in the name of Medical Center "A" patient, D.H., to her personal Chase bank account ending in XXXX8004.

It was further part of the scheme and artifice to defraud that on or about April 9, 2009, **SHERRIE BLAIR** used the internet to obtain a \$300 Payday One loan in the name of Medical Center "A" patient, L.M.

It was further part of the scheme and artifice to defraud that on or about April 14, 2009, **SHERRIE BLAIR** used the internet to obtain a \$300 Cashnetusa loan in the name of Medical Center "A" patient, A.R.

It was further part of the scheme and artifice to defraud that on or about April 16, 2009, **SHERRIE BLAIR** used the internet to obtain a \$200 Cashnetusa loan in the name of Medical Center "A" patient, L.C.

It was further part of the scheme and artifice to defraud that on or about April 16, 2009, **SHERRIE BLAIR** used the internet to obtain a \$500 Payday One loan in the name of Medical Center "A" patient, L.M..

It was further part of the scheme and artifice to defraud that on or about April 17, 2009, **SHERRIE BLAIR** used the internet to transfer \$177.53 from the Payday One loan in the name of Medical Center "A" patient, D.H., to her personal Chase bank account ending in XXXX8004.

It was further part of the scheme and artifice to defraud that on or about April 23, 2009, **SHERRIE BLAIR** used the internet to obtain a \$200 Cashnetusa loan in the name of Medical Center "A" patient, K.A.

**C. THE USE OF THE MAIL:**

On or about the date listed below, in the Eastern District of Louisiana, and elsewhere, the defendant **SHERRIE BLAIR**, for the purpose of executing the scheme and artifice set forth in Section B, knowingly and willfully caused to be delivered to her residence by United States Mail, according to the direction thereon, the following items from Best Buy using an account fraudulently opened in the name of Medical Center "A" patient, J.W., as set forth below:

COUNT	DATE	ITEMS MAILED FROM BEST BUY TO SHERRIE BLAIR'S RESIDENCE
1	March 17, 2009	42 inch Samsung Plasma TV \$500 Best Buy gift card

All in violation of Title 18, United States Code, Section 1341 and 2.

**COUNT 2**  
***(Identity Theft)***

On or about March 13, 2009, in the Eastern District of Louisiana, the defendant, **SHERRIE BLAIR**, did knowingly transfer, possess, and use without lawful authority, a means of identification of another person, to wit: the name, date of birth and social security number of Medical Center "A" patient, J.W., with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit: mail fraud in violation of 18 U.S.C. § 1341; all in violation of Title 18, United States Code, Section 1028(a)(7).

### **COUNT 3**

#### ***(Wrongful Disclosure of Individually Identifiable Health Information)***

A. The allegations contained in Section A of Count 1, are realleged and incorporated as if fully set forth herein.

B. On or about March 3, 2009, in the Eastern District of Louisiana, the defendant, **CLYDE WASHINGTON**, knowingly and for a reason other than permitted by Title 42, United States Code, Chapter 7, Subchapter XI, Part C, obtained and caused to be obtained individually identifiable health information relating to an individual, with the intent to sell, transfer, and use, and caused to be used, said information for personal gain. Specifically, defendant **CLYDE WASHINGTON** disclosed Medical Center “A” patient J.W.’s private medical information to Sherrie Blair for personal gain.

All in violation of Title 42, United States Code, Sections 1320d-6(a)(3) and (b)(3) and Title 18, United States Code, Section 2.

### **NOTICE OF MAIL FRAUD FORFEITURE**

1. The allegations of Count 1 of this bill of information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 1, the defendant, **SHERRIE BLAIR**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all

property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1341, including but not limited to:

- a. United States Currency and all interest and proceeds traceable thereto.
- b. ZT Desktop – Serial # 202819070028
- c. Dell Laptop – Serial # 4K4Z1H1
- d. Wireless Router – Serial # 310819076327
- e. Miscellaneous DVD's/CD's
- f.. Nike football cleats - size 10

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

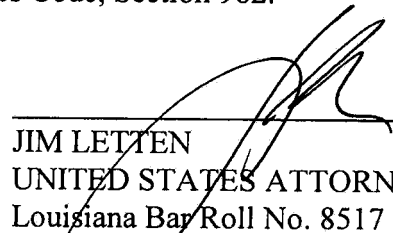
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.



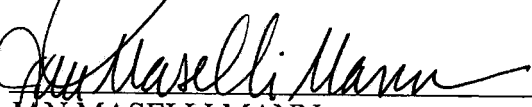
All in violation of Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Section 982.



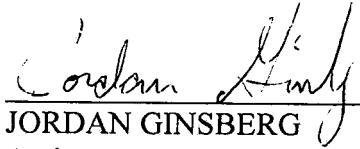
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JIM LETTEN  
UNITED STATES ATTORNEY  
Louisiana Bar Roll No. 8517



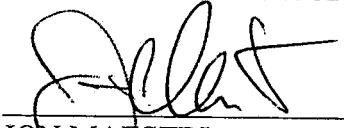
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JAN MASELLI MANN  
First Assistant United States Attorney  
Chief, Criminal Division  
Louisiana Bar Roll No. 9020



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JORDAN GINSBERG  
Assistant United States Attorney  
Illinois Bar Roll No. 6282956



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JON MAESTRI  
Assistant United States Attorney  
Louisiana Bar Roll No. 24838

New Orleans, Louisiana  
December 2, 2011